

**IN THE UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION**

BARBARA CLEM,)	
)	
Plaintiff,)	
)	
vs.)	
)	
G.D. SEARLE, LLC (hereinafter)	Civil Action No. 05-CV-293
"Searle") a subsidiary of PHARMACIA)	
CORPORATION, (hereinafter)	
"Pharmacia"), a Foreign Corporation;)	
MONSANTO COMPANY; PFIZER)	
INC.; et al,)	
)	
Defendants.)	

REPORT OF PARTIES' PLANNING MEETING

1. Pursuant to FED. R. CIV. P. 26(f), a meeting was held via teleconference on Wednesday, July 20, 2005, and was attended by:

-Navan Ward, Jr.	Counsel for Plaintiff
-Gilbert C. Steindorff, IV	Counsel for Defendants

After a full and frank discussion of the case, the following agreements were reached with respect to conducting discovery:

2. Pre-Discovery Disclosures. The parties will exchange such disclosures within thirty (30) days after the decision by the Judicial Panel for Multi-District Litigation, which is currently scheduled for hearing in July 2005.

3. Discovery Plan. The parties jointly propose to the Court the following Discovery Plan: The subjects on which discovery will be sought include the Plaintiff's complete medical history, whether Defendants are liable to Plaintiff, whether Plaintiff's damages were proximately caused by Defendants, whether and to what extent Plaintiff suffered Damages, and all records of the Defendants concerning the development, testing, packaging, marketing, and distribution of the pharmaceutical product Bextra.

Subject to a potential decision by the Judicial Panel for Multi-District Litigation, all discovery should be commenced in time to be completed by **June 12, 2006**. Proposed expert discovery deadlines are as follows: (A) – Plaintiff to identify experts and produce reports by **April 10, 2006**; (B) – Defendant's to identify experts by **May 12, 2006**.

4. Recommended due date for all dispositive motions: **April 21, 2006**.

5. Recommended cut-off for amending the pleadings and/or adding additional parties: **February 20, 2006**. The parties request that this case be set for trial in **August 2006**, with a pre-trial hearing of this case in **June 2006**.



ATTORNEY FOR PLAINTIFF



ATTORNEY FOR DEFENDANT